

PD-0788-20

ENRIQUE ANGEL RAMOS

v.

THE STATE OF TEXAS

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IN THE COURT

OF CRIMINAL APPEALS

STATE OF TEXAS

FILED
 COURT OF CRIMINAL APPEALS
 4/8/2021
 DEANA WILLIAMSON, CLERK

**APPELLANT'S FOURTH MOTION FOR EXTENSION OF ONE-DAY
 TIME TO FILE BRIEF ON THE MERITS**

COMES NOW Appellant Enrique Angel Ramos, by and through his newly appointed attorney Victoria Guerra, and files this fourth motion for extension of time to file Appellant's brief on the merits and in support thereof, would show this Court the following:

Appellant's brief on the merits is due on April 6, 2021. This is the fourth motion for extension of time that Appellant has filed. Appellant seeks a one-day extension, which if granted, would make Appellant's brief on the merits due on April 7, 2021.

The Undersigned has not been able to complete this brief on the merits for the following reasons:

1. The Appellant's brief on the merits is completed, except for edits and tables. The Undersigned tried her hardest to complete it by March 6, 2021 but was unable to. The Undersigned is taking medication for a lingering cough from a recent non-covid upper respiratory infection. Said medication has sedative side effects and

affects the Undersigned's ability to function normally in her daily tasks. As such, one additional day is needed to finalize this brief.

This one-day extension is sought not to unnecessarily delay this case, but so that justice can be done.

WHEREFORE, Appellant prays that this Court grant this motion for extension of time to file his brief by one-day, which if granted, would make his brief due on April 7, 2021.

Respectfully submitted,

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By: /s/ Victoria Guerra
Victoria Guerra
State Bar No. 08578900
Attorney for Appellant

CERTIFICATE OF SERVICE

On this 6th day of April 2021, the foregoing third motion for extension of time to file Appellant's brief on the merits was to State Prosecuting Attorney John R. Messinger to his email address: information@spa.texas.gov and to Hidalgo Assistant Criminal District Attorney Luis Gonzalez to his email address: appeals@da.co.hidalgo.tx.us via the ECF filing system.

/s/ Victoria Guerra
Victoria Guerra

CERTIFICATE OF COMPLIANCE

In compliance with TRAP 9.4(i)(3), the undersigned certifies that the number of words in this motion, excluding those matters listed in Rule 9.4(i)(1), is 226.

SIGNED this 6th day of April 2021.

/s/ Victoria Guerra
Victoria Guerra

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Victoria Guerra
Bar No. 08578900
vguerralaw@gmail.com
Envelope ID: 52194803
Status as of 4/7/2021 9:01 AM CST

Associated Case Party: State Prosecuting Attorney

Name	BarNumber	Email	TimestampSubmitted	Status
State Prosecuting Attorney Texas		information@spa.texas.gov	4/6/2021 11:34:33 PM	SENT

Associated Case Party: EnriqueAngelRamos

Name	BarNumber	Email	TimestampSubmitted	Status
Victoria Guerra		vguerralaw@gmail.com	4/6/2021 11:34:33 PM	SENT

Case Contacts

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Luis Gonzalez		luis.gonzalez@da.co.hidalgo.tx.us	4/6/2021 11:34:33 PM	SENT
Allegra Hill		Allegra@brandyvossllaw.com	4/6/2021 11:34:33 PM	SENT